



Chapel Hill, Tennessee 37034

**EB 06-36**  
**EB-06-TC-060**

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

February 6, 2006

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

United Telephone Company

A handwritten signature in black ink, appearing to read "Terry M. Wales", with a stylized flourish at the end.

Terry Wales  
General Manager

cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc., via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**Certification of CPNI FILING FEBRUARY 6, 2006  
OF  
UNITED TELEPHONE COMPANY**

**EB-06-TC-060  
EB Docket No. 06-36**

**TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU**

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), United Telephone Company ("United Telephone") states as follows:

1. As a small rural carrier with less than eighteen thousand (18,000) total access lines, United Telephone ensured that it was in compliance with the FCC rules contained in the subpart addressing Customer Proprietary Network Information ("CPNI") for 2005 in that United Telephone did not use CPNI in its marketing efforts in 2005 nor did it turn over CPNI to others in 2005.
2. Because United Telephone was not using CPNI in its marketing efforts and did not turn over CPNI to others, United Telephone certifies that it complied with the Commission's rules regarding the proper use of CPNI.
3. United Telephone's interpretation of 47 C.F.R. § 64.2009, entitled "Safeguards required for use of customer proprietary network information" was that so long as CPNI was not used by telecommunications carriers, the compliance certificate requested by the Enforcement Bureau in Public Notice DA 06-223, and as revised in Public Notice DA 06-258, was not required. Specifically, that Section provides, among other things, that a carrier "must implement a system...*prior to* the use of CPNI...." 47 C.F.R. § 64.2009(a). For that reason, United Telephone does not have a compliance certificate for the year 2005.
4. United Telephone will immediately adopt an appropriate 2006 compliance certificate in the event that CPNI is later used.

United Telephone Company

By: Terry M. Wales  
Terry Wales  
Its: General Manager

DATED: 2-6-06